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COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Metro Machine Corporation
Norfolk, Virginia
Permit No. TRO60134

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Metro Machine Corporation has applied for a Title V Operating Permit for its Norfolk, Virginia, facility. The Department has reviewed the application and has prepared a Title V Operating Permit.

Engineer/Permit Contact:_____ Date:
Linda Lightfoot
(757) 518-2005

Air Permit Manager:_____ Date:

Deputy Regional Director:_____ Date:

FACILITY INFORMATION

Permittee

Metro Machine Corporation
P.O. Box 1860
Norfolk, Virginia 23501

Facility

Metro Machine Corporation
200 Ligon Street
Norfolk, Virginia

County-Plant Identification Number: 51-710-00034

SOURCE DESCRIPTION

NAICS Code: 336611 Ship Building and Repairing

This U.S. industry comprises establishments primarily engaged in operating a shipyard. Shipyards are fixed facilities with drydocks and fabrication equipment capable of building a ship, defined as watercraft typically suitable or intended for other than personal or recreational use. Activities of shipyards include the construction of ships, their repair, conversion and alteration, the production of prefabricated ship and barge sections, and specialized services, such as ship scaling.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted on August 18, 2006. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility currently has not been found to be in violation of any state or federal applicable requirements at this time.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	Pollutant Controlled	Applicable Permit Date
1	1	Kewanee boiler H35-750-G02 (natural gas / distillate oil)	32.0 mmBtu/hr	-----	-----	8/1/1984, amended 4/23/1986
2	2	Kewanee boiler H3S500-G (natural gas / distillate oil)	20.9 mmBtu/hr	-----	-----	1/3/1986
4	4	Caterpillar diesel generator (installed 2000)	1,087.8 HP	-----	-----	-----
98, 99	98, 99	#1 and #2 Caterpillar diesel generators	2,514 HP, each	-----	-----	6/26/2002
10	-----	Dry dock abrasive blasting of ship underwater hull and freeboard surfaces (constructed 1982)	1,000 square foot/hour (8 operators)	containment screens	PM10	-----
21	-----	Pier side interior / top side hand roll / brush and airless spray painting (constructed 1971)	7 gallons/hour (2 painters)	containment screens when airless spray guns are used	PM10	-----
22	-----	Outside machine shop hand roll / brush touch-up painting (constructed 1971)	3 gallons/hour (2 painters)	-----	-----	-----
23	-----	Paint shop priming – 60% hand roll / brush and 40% airless spray (constructed 1971)	7 gallons/hour (2 painters)	-----	-----	-----
24	-----	Maintenance shop degreaser (constructed 1990)	20 gallons	cover for degreaser and 15-second parts draining	VOC	-----
25	-----	Outside machine shop degreasers (2) (constructed 1990)	40 gallons, each	cover for degreaser and 15-second parts draining	VOC	-----
27	-----	Inside machine shop degreasers (2) (constructed 1990)	20 and 40 gallons	cover for degreaser and 15-second parts draining	VOC	-----
28	-----	SPEEDE dry dock painting	98 gallons/hour (16 painters)	containment screens when airless spray guns are used	PM10	6/26/2002

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

The 2006 emissions, as reported by the source to DEQ, are summarized in the following tables.

2006 Criteria Pollutant Emission in Tons/Year					
	VOC	CO	SO_2	PM_{10}	NO_x
Total	14.4	2.5	0.02	45.2	3.3

EMISSION UNIT APPLICABLE REQUIREMENTS – Kewanee Boiler (32.0 mmBtu/hr)

Limitations
Specific limitations for the emissions unit are based on the applicable requirements found in the New Source Review permit issued August 1, 1984, and amended April 23, 1986.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-20	Compliance for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction

Monitoring and Recordkeeping
No specific monitoring and recordkeeping requirements exist in the New Source Review permit. Monitoring and recordkeeping requirements for throughput and visible emissions have been added to the Title V permit to ensure enforceability.

No periodic monitoring for the emissions limits for criteria pollutants is required in the permit. The following demonstration is provided to show that there is not a great likelihood that the emission limits will be exceeded:

Emission Unit Size = 32.0 mmBtu/hr
Heating Value of Distillate Fuel = 138,000 Btu/gal
Sulfur Content of Fuel = 0.5%
Fuel Throughput = 710,000 gallons
Hourly Throughput = (32.0 mmBtu/hr)/(138,000 Btu/gal) = 231.9 gal/hr

Emission Factors from AP42 (Fuel Oil Combustion, 9/98) for distillate fuel

SO2	142S lb/1000 gal
PM10	1.08 lb/1000 gal

SO2 emissions:

(((142) x (0.5) / 1000) lb/gal) x (231.9 gal/hr) = ***16.5 lb/hr SO2***
Title V permitted rate = ***19.1 lb/hr SO2***

(((142) x (0.5) / 1000) lb/gal) x (710,000 gal/yr) / (2000 lb/ton) = ***25.2 tons/yr SO2***
Title V permitted rate = ***30.2 tons/yr SO2***

(16.5 lb/hr SO2) / (32.0 mmBtu/hr) = ***0.5 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM emissions:

((1.08) / (1000) lb/gal) x (231.9 gal/hr) = ***0.3 lb/hr PM***
Title V permitted rate = ***0.5 lb/hr PM***

((1.08) / (1000) lb/gal) x (710,000 gal/hr) / (2000 lb/ton) = ***0.4 ton/yr PM combined***
Title V permitted rate = ***0.8 ton/yr PM combined***

(0.4 lb/hr PM) / (32.0 mmBtu/hr) = ***0.01 lb/mmBtu***
Title V permitted rate = ***0.02 lb/mmBtu***

Based on the demonstration, it appears there is not a great likelihood that the emission limits will be exceeded, and no additional periodic monitoring other than opacity has been required for this unit.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting
There are no specific reporting requirements except for excess emissions.

Streamlined Requirements
There are no streamlined requirements for this emissions unit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Kewanee Boiler (20.9 mmBtu/hr)

Limitations
Specific limitations for the emissions unit are based on the applicable requirements found in the New Source Review permit issued January 3, 1986.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-20	Compliance for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction

Monitoring and Recordkeeping
No specific monitoring and recordkeeping requirements exist in the New Source Review permit. Monitoring and recordkeeping requirements for throughput and visible emissions have been added to the Title V permit to ensure enforceability.

No periodic monitoring for the emissions limits for criteria pollutants is required in the permit. The following demonstration is provided to show that there is not a great likelihood that the emission limits will be exceeded:

Emission Unit Size = 20.9 mmBtu/hr
Heating Value of Distillate Fuel = 138,000 Btu/gal
Sulfur Content of Fuel = 0.5%
Fuel Throughput = 1,200,000 gallons
Hourly Throughput = (20.9 mmBtu/hr)/(138,000 Btu/gal) = 151.4 gal/hr

Emission Factors from AP42 (Fuel Oil Combustion, 9/98) for distillate fuel

SO2	142S lb/1000 gal
PM10	1.08 lb/1000 gal

SO2 emissions:

(((142) x (0.5) / 1000) lb/gal) x (151.4 gal/hr) = ***10.7 lb/hr SO2***
Title V permitted rate = ***12.7 lb/hr SO2***

(((142) x (0.5) / 1000) lb/gal) x (1,200,000 gal/yr) / (2000 lb/ton) = ***42.6 tons/yr SO2***
Title V permitted rate = ***42.6 tons/yr SO2***

(10.7 lb/hr SO2) / (20.9 mmBtu/hr) = ***0.5 lb/mmBtu***
Title V permitted rate = ***0.6 lb/mmBtu***

PM emissions:

((1.08) / (1000) lb/gal) x (151.4 gal/hr) = ***0.2 lb/hr PM***
Title V permitted rate = ***0.4 lb/hr PM***

((1.08) / (1000) lb/gal) x (1,200,000 gal/hr) / (2000 lb/ton) = ***0.6 ton/yr PM***
Title V permitted rate = ***1.2 ton/yr PM***

(0.6 lb/hr PM) / (20.9 mmBtu/hr) = ***0.03 lb/mmBtu***
Title V permitted rate = ***0.1 lb/mmBtu***

Based on the demonstration, it appears there is not a great likelihood that the emission limits will be exceeded, and no additional periodic monitoring other than opacity has been required for this unit.

In addition, the throughput of natural gas equivalent to the permitted throughput of distillate oil was determined by calculating the lb/mmBtu value for each fuel. Based on the limiting values, the throughput of natural gas equivalent to 1,200,000 gallons per year of distillate fuel was determined to be 167 million cubic feet per year.

Pollutant	DO emission factor	DO heating value	lb/mmBtu value
SO2	78.5 lbs/1000 gallons	138,000 Btu/gal	0.569 lb/mmBtu
NOx	55 lbs/1000 gallons	138,000 Btu/gal	0.399 lb/mmBtu
CO	*5 lbs/1000 gallons*	*138,000 Btu/gal*	*0.036 lb/mmBtu*
PM	2 lbs/1000 gallons	138,000 Btu/gal	0.014 lb/mmBtu
PM10	*1 lb/1000 gallons*	*138,000 Btu/gal*	*0.007 lb/mmBtu*
VOC	*0.28 lb/1000 gallons*	*138,000 Btu/gal*	*0.002 lb/mmBtu*

Pollutant	NG emission factor	NG heating value	lb/mmBtu value
SO2	0.6 lb/mmcf	1000 Btu/scf	0.001 lb/mmBtu
NOx	100 lb/mmcf	1000 Btu/scf	0.100 lb/mmBtu
CO	84 lb/mmcf	1000 Btu/scf	0.084 lb/mmBtu
PM	7.6 lb/mmcf	1000 Btu/scf	0.008 lb/mmBtu
PM10	7.6 lb/mmcf	1000 Btu/scf	0.008 lb/mmBtu
VOC	5.5 lb/mmcf	1000 Btu/scf	0.006 lb/mmBtu

For CO:

Emissions from combustion of 1,200,000 gal/yr distillate = 3.0 tons/yr

Limiting value from table above =	0.036 lb/mmBtu
(0.036 lb/mmBtu) x (1000 Btu/cf) =	36 lb/mmcf
(3 tons/yr) x (2000 lbs/ton) / (36 lb/mmcf) =	167 mmcf/yr

For PM10:

Emissions from combustion of 1,200,000 gal/yr distillate = 0.6 tpy

Limiting value from table above =	0.007 lb/mmBtu
(0.007 lb/mmbtu) x (1000 Btu/cf) =	7 lb/mmcf
(0.6 ton/yr) x (2000 lbs/ton) / (7 lb/mmcf) =	171 mmcf/yr

For VOC:

Emissions from combustion of 1,200,000 gal/yr distillate = 0.2 tpy

Limiting value from table above =	0.002 lb/mmBtu
(0.002 lb/mmBtu) x (1000 Btu/cf) =	2 lb/mmcf
(0.2 ton/yr) x (2000 lbs/ton) / (2 lb/mmcf) =	200 mmcf/yr

The maximum amount of natural gas that can be burned for the same BTU value as the permitted throughput of distillate fuel is 167 million cubic feet per year.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

There are no specific reporting requirements except for excess emissions.

Streamlined Requirements

There are no streamlined requirements for this emissions unit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Caterpillar Diesel Generator (1,087.8 HP)

Limitations
The emissions unit is an emergency generator. The unit is not applicable to permitting under the minor New Source Review program (9 VAC 5, Chapter 80, Article 6, of the Virginia Regulations for the Control and Abatement of Air Pollution).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-20	Compliance for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction

The generator was evaluated for MACT Subpart ZZZZ (RICE MACT). The unit is compression ignition (diesel) and was installed prior to December 19, 2002; the unit is exempt from the MACT.

Monitoring and Recordkeeping
Monitoring and recordkeeping requirements for visible emissions have been added to the Title V permit to ensure enforceability.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements
There are no streamlined requirements for this emissions unit.

EMISSION UNIT APPLICABLE REQUIREMENTS – #1 and #2 Caterpillar Diesel Generators (2,514 HP, each)

Limitations
Specific limitations for the emissions unit are based on the applicable requirements found in the New Source Review permit issued June 26, 2002.

The generators were evaluated for MACT Subpart ZZZZ (RICE MACT). The units are compression ignition (diesel) and were installed prior to December 19, 2002; the units are exempt from the MACT.

Monitoring and Recordkeeping
Monitoring and recordkeeping requirements for fuel certifications and onsite records (hours of operation, fuel supplier certifications, and maintenance) have been incorporated from the New Source Review permit. Monitoring and recordkeeping for visible emissions have been added. All records are incorporated into the Title V permit to ensure enforceability.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements
There are no streamlined requirements for these emissions units.

EMISSION UNIT APPLICABLE REQUIREMENTS – Dry Dock Abrasive Blasting

Limitations
The emissions unit is dry dock abrasive blasting. The unit is not applicable to permitting under the minor New Source Review program (9 VAC 5, Chapter 80, Article 6, of the Virginia Regulations for the Control and Abatement of Air Pollution).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-50-20	Compliance for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction

Monitoring and Recordkeeping
The permit does not include a recordkeeping and reporting requirement for opacity for abrasive blasting. Abrasive blasting creates fugitive emissions. Because it is not a point source, an opacity determination cannot be made.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements
There are no streamlined requirements for these emissions units.

EMISSION UNIT APPLICABLE REQUIREMENTS – Painting Operations

Limitations
Specific limitations for the emissions unit are based on the applicable requirements found in the New Source Review (NSR) permit issued June 26, 2002.

The following subpart of the Code of Federal Regulations (CFR) has been determined to be applicable:
40 CFR Part 63 Subpart II National Emission Standards for Shipbuilding and Ship Repair

Limitations and requirements from both the New Source Review permit and the CFR have been incorporated into the permit. Both the NSR permit and the CFR have been cited in the Title V permit because some painting operations are not included in the NSR permit.

Compliance Procedures
Specific compliance procedures from the NSR permit and from the CFR have been incorporated into the Title V permit.

Monitoring, Recordkeeping, and Reporting
Specific monitoring, recordkeeping, and reporting requirements from the NSR permit and from the CFR have been incorporated into the Title V permit.

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements
There are no streamlined requirements for this emissions unit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Degreaser Requirements

Limitations
The emissions units are degreasers. The units are not applicable to permitting under the minor New Source Review program (9 VAC 5, Chapter 80, Article 6, of the Virginia Regulations for the Control and Abatement of Air Pollution).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5, Chapter 40, Article 24: Emissions Standards for Solvent Metal Cleaning Operations Using Non-Halogenated Solvents (Rule 4-24)

Testing
The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Streamlined Requirements
There are no streamlined requirements for this emissions unit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration
This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia,* and the "Department of Environmental Quality Agency Policy Statement No. 3-2006".

F. Failure/Malfunction Reporting
Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

J. Permit Modification

This general condition cites the sections that follow:
9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits
9 VAC 5-80-260. Enforcement
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense
The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

Y. Asbestos Requirements
The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

STATE ONLY APPLICABLE REQUIREMENTS
The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5-40-140	Existing Source Standard for Odor
9 VAC 5-40-180	Existing Source Standard for Toxic Pollutants
9 VAC 5-50-140	New and Modified Source Standard for Odorous Emissions
9 VAC 5-50-180	New and Modified Source Standard for Toxic Pollutants

INAPPLICABLE REQUIREMENTS
The following requirements have been identified by Metro Machine Corporation as being inapplicable:

Citation	Title of Citation	Description of Inapplicability
40 CFR 63 Subpart DDDDD	Boiler MACT	Rule has been vacated
40 CFR 60 Subpart Dc	Standards of Performance for small industrial-commercial-institutional generating units	Boilers installed prior to 6/9/1989
40 CFR 63 Subpart ZZZZ	RICE MACT	Compression ignition engines installed prior to 12/19/2002

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

COMPLIANCE PLAN
There is no compliance plan associated with this permit

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity 9 VAC 5-80-720 C)
5	Caterpillar diesel compressor	9 VAC 5-80-720 B	PM10, PM, VOC, SO2, NOx, CO, HAPs	440 HP
6	Caterpillar diesel compressor	9 VAC 5-80-720 B	PM10, PM, VOC, SO2, NOx, CO, HAPs	440 HP
11	Enclosed bead blaster in outside machine shop	9 VAC 5-80-720 B	PM10	4 lbs beads
12	Enclosed bead blaster in boiler shop	9 VAC 5-80-720 B	PM10	4 lbs beads
13	Enclosed bead blaster in compressor / fire pump maintenance area	9 VAC 5-80-720 B	PM10	4 lbs beads
14	Enclosed bead blaster in inside machine shop	9 VAC 5-80-720 B	PM10	4 lbs beads
15	Enclosed bead blaster in electric shop	9 VAC 5-80-720 B	PM10	4 lbs beads
16	Air conditioner maintenance	9 VAC 5-80-720 B	VOC	Not applicable
29	Detroit Diesel 253 emergency generator	9 VAC 5-80-720 C	PM10, PM, VOC, SO2, NOx, CO, HAPs	55 HP
31	Wet Slip Detroit diesel 671 fire pump	9 VAC 5-80-720 C	PM10, PM, VOC, SO2, NOx, CO, HAPs	235 HP
32	Finger pier Cummins Diesel 903 fire pump	9 VAC 5-80-720 C	PM10, PM, VOC, SO2, NOx, CO, HAPs	240 HP
33	#1 P&H diesel truck crane	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	125 HP
34	#2 Detroit diesel truck crane	9 VAC 5-80-720 A	PM10, PM, VOC, SO2 NOx, CO, HAPs	157 HP
35	#3 Detroit diesel truck crane	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	165 HP
36	#4 Detroit diesel crawler crane	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	264 HP
37	#3 Perkins diesel welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	49 HP
38	#4 Perkins diesel welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	55 HP
39	#5 Perkins diesel welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	49 HP
40	#8 Ford gasoline welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	75 HP
41	#10 Hobart gasoline welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	50 HP
42	#12 Perkins diesel welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	49 HP
43	#15 Perkins diesel welder	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	49 HP

44	#1 Nissan propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	46 HP
45	#2 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
46	#3 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
47	#4 Nissan propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	46 HP
48	#5 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
49	#6 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
50	#7 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
51	#8 Nissan propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	46 HP
52	#9 Detroit diesel fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	90 HP
53	#14 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
54	#15 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
55	#16 Nissan propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	46 HP
56	#18 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
57	#20 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
58	#21 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
59	#22 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	78 HP
60	#23 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
61	#24 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	71 HP
62	#26 Chrysler propane fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	78 HP
63	#29 Cummins diesel fork lift	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	152 HP
64	Portable kerosene heaters	9 VAC 5-80-720 A	PM10, PM, VOC, SO2, NOx, CO, HAPs	0.15 mmBtu/hr each
66	Electroplating in electric shop	9 VAC 5-80-720 B	PM10, inorganic HAPs	Not Applicable
67	Distillation unit in hazardous waste storage area	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
68	Woodworking operations in carpenter shop	9 VAC 5-80-720 B	PM10	Not Applicable
69	Paint Mixing in paint shop	9 VAC 5-80-720 B	VOCs, VOHAPs	36 gallons per hour
70	Welding operations in steel shop and pipe shop	9 VAC 5-80-720 A	PM10, inorganic HAPs	Not Applicable

71	Maintenance shop touch-up painting (90% hand-applied; 10% airless spray)	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
72	Covered Metro 88 degreasers (2) in tool room (contains no solvents)	9 VAC 5-80-720 B	None	10 gallons each
73	Spray can degreasers, cleaners, etc. in maintenance shop	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
74	Spray can degreasers, cleaners, etc. in outside machine shop	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
75	Spray can degreasers, cleaners, etc. in boiler shop	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
76	Spray can degreasers, cleaners, etc. in inside machine shop	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable
77	Spray can degreasers, cleaners, etc. in electric shop	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable
78	Solvents, oils, hydraulic fluids, and antifreeze in sealed 55-gallon drums and sealed hazardous waste containers in maintenance shop and lubricants in inside maintenance shop	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable
79	Solvents, cleaners, degreasers, penetrants, and lubricants in spray cans and in sealed 55-gallon drums in tool room	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable
80	Hazardous waste in sealed 55 gallon drums in hazardous waste storage building	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable
81	Waste oil storage tanks (2) in hazardous waste storage building and portable tankers in yard	9 VAC 5-80-720 B	VOCs, VOHAPs	3,000 gallons each
82	Propane storage tank near Navy paint storage	9 VAC 5-80-720 B	VOCs	1,000 gallons
83	Underground gasoline storage tank near Navy paint storage	9 VAC 5-80-720 B	VOCs, VOHAPs	10,000 gallons
84	Underground diesel fuel storage tank	9 VAC 5-80-720 A	VOCs, VOHAPs	4,000 gallons
85	Portable diesel (one 800-gallon, one 500-gallon, one 300-gallon, and one 125-gallon) and gasoline (125-gallon) storage containers in yard (including fire pump tanks)	9 VAC 5-80-720 A	VOCs, VOHAPs	See emission unit description at left
86	Small containers of acetylene, liquid oxygen, hydrogen, and argon near Navy paint storage	9 VAC 5-80-720 A	VOCs (acetylene containers)	Not Applicable
87	Navy paint storage areas with 5-gallon containers	9 VAC 5-80-720 A	VOCs, VOHAPs	Not Applicable
88	Varsol storage tank near Navy paint storage	9 VAC 5-80-720 B	VOCs, VOHAPs	300 gallons

89	Underground #2 oil storage tanks (2) near boiler room	9 VAC 5-80-720 B	VOCs, VOHAPs	15,000 gallons each
90	Diesel fuel storage tank in compressor /fire pump maintenance area	9 VAC 5-80-720 B	VOCs, VOHAPs	500 gallons
91	Gasoline loading pumps	9 VAC 5-80-720 B	VOCs, VOHAPs	1,260 gallons
92	Diesel fuel loading pumps	9 VAC 5-80-720 A	VOCs, VOHAPs	840 gallons per hour
93	Oil/water separator and treatment system including processing tanks	9 VAC 5-80-720 B	VOCs, VOHAPs	Not Applicable

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the [newspaper] from [date] to [date] .